

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

REVLON CONSUMER PRODUCTS LLC and
ELIZABETH ARDEN, INC.

Plaintiffs,

-against-

GIVE BACK BEAUTY S.A., et al.,

Defendants.

Case No. 1:24-cv-06438-ER-RWL

I, Patrizio Stella, under penalty of perjury, hereby declare as follows:

1. I am over the age of 18 and competent to testify. I submit this Declaration in support of Defendants' Opposition to Plaintiffs' Motion for a Preliminary Injunction and Defendants' Opposition to Plaintiffs' Motion for Expedited Discovery. I have personal knowledge of the subject matter set forth herein.

2. In January 2024, I began employment at Give Back Beauty Group ("GBB") as Group Chief Executive Officer. I lead GBB, managing the entire Group organization, covering global partnerships, licensing, and distribution agreements across all divisions and the entire portfolio of brands.

3. I have been in the beauty business since 1994. I have over two decades in senior leadership positions at global luxury and beauty companies. After significant experiences in Procter & Gamble and Johnson & Johnson in the early 2000s, I served as the global CEO of Bulgari Parfums and Cosmétiques, before being appointed Europe CEO of Parfums Christian Dior and later becoming CEO & Country General Manager of LVMH Beauty Italy. I then co-founded – and led as CEO – the original luxury division of Give Back Beauty. Most recently, after supporting

major beauty and fragrance brands through my own consultancy and management company, I held the position of CEO at Desire Fragrances Group. Throughout my career, I have developed relationships with all key vendors in the industry, including [REDACTED], which I have worked with for over twenty-five years.

Give Back Beauty Is a Global Beauty Company With Extensive Capabilities

4. GBB is a globally-operated beauty group that partners with world-renowned brands

[REDACTED]

[REDACTED]

[REDACTED], to create, develop and support their established and upcoming beauty brands. GBB works through global partnerships, licensing and distribution agreements to engage with brands and celebrities to bring fragrances and other beauty products to consumers worldwide.

5. GBB is a best-in-class global beauty partner to offer innovative product, digital, and business models, combining the flexibility, focus and long-term mindset of entrepreneurial companies with the best practices of large groups.

6. GBB is one of the fastest growing beauty companies in the world, with fragrance revenues comparable to Revlon's. GBB's 15-person top management team, including me, has a combined over 350 years of experience, having worked at well-known beauty, luxury, and consumer brands around the world.

7. The fragrance industry is competitive, and GBB welcomes the opportunity to fairly compete with established and breakout beauty companies to deliver the best for its brand partners.

8. GBB leverages its market expertise, digital and in-store promotional assets, strong financial position and control of distribution across more than 25,000 retail stores and enjoys win-

win relationships with global ecommerce retailers, therefore competing for opportunities to innovate and partner with renowned brands and celebrities.

9. GBB has approximately 350 employees around the world, with offices in Geneva, Los Angeles, New York, Toronto, Miami, Paris, Milan, London, Munich, Amsterdam, Dubai, Hong Kong, and Sydney. GBB's electronic data systems and servers are based in Europe.

GBB's Work Toward Performing Its Britney Brands Contract Obligations

10. After GBB [REDACTED] I reached out to [REDACTED] to request samples of fragrance oils to conduct stability and compatibility testing, as is a common and accepted industry practice for an incoming licensee. I never asked for or received the fragrance formulations or specific ingredients for the fragrance oil, nor am I or GBB interested in the formulations or specific ingredients. To be clear, when a licensee asks for fragrance oil, a fragrance house does not send it to the licensee, but rather to the manufacturer, which then mixes oil with water and other ingredients to create the fragrance for testing purposes. GBB, as the licensee, would not even receive the fragrance oil sample, but only the testing results to show the stability and compatibility of the fragrance. GBB has no intention or need to discover the formulas of any Britney Brands fragrances ever manufactured or sold by Revlon.

11. I asked [REDACTED] to provide quotations as to what it would cost GBB to produce fragrances once the Britney Brands license agreement took effect.

12. I also asked [REDACTED] for the anticipated lead times on production to be ready once the license [REDACTED] took effect.

13. [REDACTED] was planning to provide this information, as is necessary and customary in the industry, to ensure that GBB and [REDACTED] will be ready to begin production on January 1, 2025, once GBB's license [REDACTED] with Britney Brands takes effect.

14. Similarly, my supply team contacted vendors to discuss purchasing fragrance bottles and caps so that GBB and its suppliers will be ready to begin manufacturing when GBB's license [REDACTED] with Britney Brands takes effect as of January 1, 2025.

15. Since beginning her employment at GBB, Vanessa Kidd's role with Britney Brands has not involved interacting with or directing GBB's business with any customer or supplier. Instead, her role has involved working on future brand development plans to go into effect as of January 1, 2025.

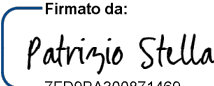
16. Dominick Romeo reports to Ms. Kidd and is similarly not involved in interacting with or directing GBB's business with any customer or supplier regarding the production of Britney Brands products. Dominick's role involves assisting Ms. Kidd in creating future brand development plans.

17. Except as described above, Vanessa Kidd, Dominick Romeo, Ashley Fass, and Reid Mulvihill do not have day-to-day responsibilities related to brands that had relationships with Revlon during their tenure at Revlon.

18. GBB is not currently engaged in manufacturing, advertising or selling any fragrances licensed by Britney Brands to Revlon. GBB has not asked [REDACTED] to begin selling to GBB any fragrance for Britney Brands before January 1, 2025.

I declare under penalty of perjury that the foregoing is true and correct and that this Declaration is executed in New York on this 20th day of September 2024.

By:

Firmato da:

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Patrizio Stella